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CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF OHIO CLEVELAND

May, 17, 2019

MOTION TO INTERVENE AS INTERESTED PARTY: CASE NO. 1:19-cv-14: DIGITAL MEDIA SOLUTIONS, LLC (Plaintiff) vs. SOUTH UNIVERSITY OF OHIO, LLC, et al. (Defendants)

United States District Court Northern District of Ohio Eastern Division Judge Dan Aaron Polster Magistrate Judge Thomas M. Parker

Dear Judge Polster,

I am a former fulltime faculty member of the Art Institute of Pittsburgh Online Division, and I taught for the school for 12 years. Along with many of my colleagues, I still have not received a paycheck for the pay period of Feb. 22 -March 8, 2019, which was due to be paid on March 15 by DCEH. I have no legal expertise, and am unable to afford legal representation, but the clerk at your court suggested that I submit this letter to represent myself in the court proceedings as a party needing redress. I am aware that the Receiver claims to be making every effort to find funding for our final pay, but with the end of the Receivership approaching quickly, this outcome is seeming less likely.

My main aim with this request is to receive the final pay mentioned; however, I have some additional concerns:

- I am concerned about the security of my personal information housed on DCEH servers and how that information will be protected. I would like to see a plan to address this for former employees.
- 2. Additionally, to aid employees in our own record keeping and ability to defend ourselves, or act legally, I would like to request that former employees be given temporary access to, or copies of:
  - a. Our paystubs for a year of employment prior to closure.
  - b. Documentation of DCEH Health Plans for a year of employment prior to closure.
  - c. Documentation of the DCEH Standards, Policies and Procedures library for the year prior to closure of the company.
- 3. Employees paid medical insurance premiums in 2018 and 2019 for a medical plan that was not being funded. We should be reimbursed, and also need protection from medical costs accrued while this deception was being enacted. I personally do not have any outstanding medical bills that would have been covered by my plan, but am concerned for my colleagues who do.

Thank you for your consideration of these requests.

Sincerely,

Debbie Baskerville

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